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24 *Attorneys for Plaintiffs*

25 **UNITED STATES DISTRICT COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA**

27 CHASOM BROWN, WILLIAM BYATT,
28 JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

29 Plaintiffs,

30 vs.

31 GOOGLE LLC,

32 Defendant.

33 William Christopher Carmody
34 (admitted *pro hac vice*)
35 Shawn J. Rabin (admitted *pro hac vice*)
36 Steven M. Shepard (admitted *pro hac vice*)
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61 Case No.: 4:20-cv-03664-YGR-SVK

62 **PLAINTIFFS' MOTION RE: SEALING**
63 **PORTIONS OF PLAINTIFFS' REPLY IN**
64 **SUPPORT OF REQUEST FOR AN**
65 **ORDER FOR GOOGLE TO SHOW**
66 **CAUSE RE: DISCOVERY**
67 **MISCONDUCT**

68 The Honorable Susan van Keulen
69 Courtroom 6 – 4th Floor
70 Date: April 21, 2022

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
 2 Google LLC (“Google”)’s material should be sealed. This material is included in Plaintiffs’ Reply
 3 in Support of Their Motion for Order Requiring Google to Show Cause Why It Should Not Be
 4 Sanctioned for Discovery Misconduct (“Reply”). The material has been designated by Google as
 5 “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to
 6 the following information in the Reply:

7 Document Sought to 8 be Sealed	9 Party Claiming 10 Confidentiality	11 Portions to be filed 12 under seal	13 Basis for Sealing 14 Portion of Document
15 Reply Brief	16 Google	17 Portions highlighted in 18 yellow throughout	19 Refers to material 20 designated 21 “Confidential” and 22 “Highly Confidential” 23 pursuant to the 24 Protective Order
25 Declaration of Mark 26 C. Mao in Support of 27 Plaintiffs’ Reply 28 (“Mao Reply Decl.”)	29 Google	30 Portions highlighted in 31 yellow throughout	32 Refers to material 33 designated 34 “Confidential” and 35 “Highly Confidential” 36 pursuant to the 37 Protective Order
38 Exhibits 1-6 of the 39 Mao Reply 40 Declaration	41 Google	42 Entirety	43 Material designated 44 “Confidential” and 45 “Highly Confidential” 46 pursuant to the 47 Protective Order
48 Declaration of 49 Christopher 50 Thompson 51 (“Thompson Decl.”)	52 Google	53 Entirely	54 Refers to material 55 designated 56 “Confidential” and 57 “Highly Confidential” 58 pursuant to the 59 Protective Order
60 Exhibits B-D of the 61 Thompson Declaration	62 Google	63 Entirety	64 Material designated 65 “Confidential” and 66 “Highly Confidential” 67 pursuant to the 68 Protective Order

25 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
 26 responsibility to establish that its designated material is sealable.
 27
 28

1 Dated: April 11, 2022

Respectfully submitted,

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